

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA :
:
V. : CASE NO.
: 15-CR-00381-RJD
:
:
:
:
ALEXANDER GARKUSHA, et al :
:

JEROME J FROELICH JR.'S
PETITION FOR LEAVE OF ABSENCE

Comes now, Jerome J. Froelich Jr. and respectfully applies to this Court for a leave of absence from May 23, 2016 to and including June 8, 2016 for the following reasons:

1.

Mr. Froelich is the attorney of record for Defendant Alexander Garkusha in the above captioned case.

2.

Mr. Froelich has a business meeting in New York on May 23, 2016 and then leaves on May 24 for Rome, Italy for a meeting of the American Board of Criminal Lawyers (ABCL). Mr. Froelich is the President of the ABCL. Mr. Froelich will be in Italy until June 8, 2016.

3.

Mr. Froelich plans are long standing and Mr. Froelich's plane tickets and hotel reservations have been made and are non refundable.

4.

Mr. Froelich has received a leave of absence in all his other cases.

5.

Mr. Froelich respectfully requests that any and all proceedings involving Mr. Garkusha be stayed during Mr. Froelich's leave of absence. A proposed order is attached hereto.

WHEREFORE, Petitioner prays that he be granted a leave of absence and the aforementioned case be stayed from May 23, 2016 through June 8, 2016.

Respectfully submitted,

S/ Jerome J. Froelich Jr.
Jerome J. Froelich, Jr.
State Bar No. 278150

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ORDER FOR LEAVE OF ABSENCE

The Court having heard and considered, Jerome J. Froelich Jr., Counsel for Defendant Alexander Garkusha, petition for a leave of absence hereby grants Mr. Froelich a leave of absence applicable to all trials, hearings, motions, filings and other legal proceedings that may be scheduled in the above-referenced matter from May 23, 2016 through June 8, 2016, inclusive.

SO ORDERED, this _____ day of April, 2016.

Judge, United States District Court

CERTIFICATE OF SERVICE

This is to certify that I have this day served counsel for the opposing party with a copy of the within and foregoing with the Clerk of Court using the CM-ECF system which will automatically send e-mail notification of such filing to opposing counsel:

Christopher Allen Ott, Esq.
Christopher L. Nasson, Esq.
Richard M. Tucker, Esq.
Assistant United States Attorney
United States Attorney's Office for the Eastern District of New York
271 Cadman Plaza East
Brooklyn, New York 11201

This 12th day of April, 2016.

S/Jerome J. Froelich Jr.
JEROME J. FROELICH, JR.
Georgia State Bar No. 278150

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